

DEC 21 2011

CLERK, U.S. DISTRICT COURT  
ALEXANDRIA, VIRGINIAIN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 1:11cr199
	)	
MATILDA ANTWI,	)	
	)	
Defendant.	)	

STATEMENT OF FACTS

The parties stipulate that the allegations in Count One of the superseding indictment filed on August 24, 2011, and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. The defendant, Matilda Antwi, is a citizen of Ghana and a resident of Alexandria, Virginia, in the Eastern District of Virginia.

2. Edward Macauley, a/k/a. "Cudjoe Opoku," was a resident of Ghana. Macauley was a leader of a Ghana-based heroin trafficking organization and was responsible for importing into the United States multiple kilograms of heroin. The Macauley organization used couriers aboard commercial airlines to smuggle heroin from Ghana to the United States. The defendant was a courier for the Macauley organization.

3. In or about September 2010, Macauley offered to pay the defendant to smuggle heroin into the United States.

4. In or about September 2010, Macauley met with the defendant at a hotel in Accra, Ghana, and gave her a quantity of heroin for importation into the United States. Macauley also

gave the defendant a telephone number to call to arrange delivery of the heroin once she arrived in the United States.

5. On or about September 4, 2010, the defendant, while in possession of approximately 1.2 kilograms of heroin, attempted to depart Kotoka International Airport in Ghana on United Airlines flight number 991, which was bound for Dulles International Airport in the Eastern District of Virginia.

6. The acts taken by the defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case nor does it identify all of the persons with whom the defendant may have engaged in illegal activities. The defendant further acknowledges that the defendant is obligated under the plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

Respectfully submitted,

NEIL H. MACBRIDE  
UNITED STATES ATTORNEY

By: 


James P. Gillis

Karen L. Dunn

Assistant United States Attorneys

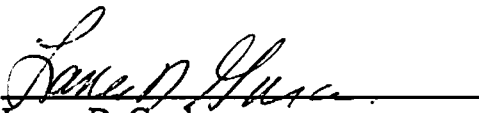
Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the United States and me, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

Dated: 12/17/11

  
Matilda Antwi  
Defendant

Defense Counsel's Signature: I am counsel for the defendant in this case. I have carefully reviewed the above statement of facts with the defendant. To my knowledge, the defendant's decision to stipulate to these facts is an informed and voluntary one.

Date: 12/21/11

  
Lance D. Gardner  
Counsel for the Defendant